

1 HEJAMNOWSKI & McCREA LLC
Charles H. McCrea (SBN #104)
2 520 South Fourth Street, Suite 320
Las Vegas, NV 89101
3 Telephone: 702-834-8777
Facsimile: 702-834-5262
4 Email: chm@hmlawlv.com

5 BROWNE GEORGE ROSS LLP
Keith J. Wesley (CA SBN 229276)*
6 kwesley@bgrfirm.com
Lori Sambol Brody (CA SBN 150545)*
7 lbrody@bgrfirm.com
2121 Avenue of the Stars, Suite 2800
8 Los Angeles, California 90067
Telephone: (310) 274-7100
9 Facsimile: (310) 275-5697

10 * *Pro hac vice* to be submitted

11 Attorneys for Defendant Skyline Security
Management, Inc.

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 MICHAEL McMILLAN, individually and on
behalf of all other similarly situated,

16 Plaintiff,

17 vs.

18 SKYLINE SECURITY MANAGEMENT,
19 INC.,

20 Defendant.

Case No. 2:19-CV-01995-GMN-BNW

The Hon. Gloria M. Navarro

**DEFENDANT'S UNOPPOSED MOTION
FOR LEAVE FOR AN EXTENSION OF
TIME TO RESPOND TO PLAINTIFF'S
CLASS ACTION COMPLAINT**

21
22 Defendant Skyline Security Management, Inc. ("Skyline") respectfully files this motion for
23 leave for an extension of time to respond to Plaintiff Michael McMillan's ("Plaintiff") class action
24 complaint. (Dkt. No. 1.)

25 The deadline for Skyline to respond to Plaintiff's class action complaint is December 9,
26 2019. Due to the nature of the allegations in this Telephone Consumer Protection Act class action,
27 and to permit time for Skyline's counsel who have just been retained in this action to get up to speed
28 on this case, Skyline requests the Court to extend the time to file its response by 30 days to January

1 8, 2020.

2 Plaintiff's counsel consented to the 30-day extension on December 3, 2019 via email and to
3 the filing of this motion on December 5, 2019 via email.

4 If granted, the new deadline for Skyline to file its response to Plaintiff's class action
5 complaint would be no later than January 8, 2020. This request is made in good faith and for no
6 improper purpose and does not prejudice either party.

7 WHEREFORE, Skyline respectfully requests the Court to grant this motion for leave for a
8 30-day extension of time to respond to Plaintiff's class action complaint.

9 DATED: December 5, 2019

Respectfully submitted,

10 HEJMANOWSKI & McCREA LLC

11 By: /s/Charles H. McCrea
12 Charles H. McCrea (SBN #104)
13 520 South Fourth Street, Suite 320
Las Vegas, Nevada 89101

14 BROWNE GEORGE ROSS LLP
15 Keith J. Wesley (CA SBN 229276)*
16 Lori Sambol Brody (CA SBN 150545)*
17 2121 Avenue of the Stars, Suite 2800
Los Angeles, California 90067
*Pro hac vice to be submitted

18 *Attorneys for Defendant Skyline Security*
19 *Management, Inc*

20 IT IS SO ORDERED.

21 12/6/19

22 DATED: _____

23 

24 UNITED STATES DISTRICT COURT JUDGE/
25 MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I am an employee of
3 HEJMANOWSKI & McCREA LLC and that on this 5th day of December 2019, I caused the foregoing
4 **DEFENDANT'S UNOPPOSED MOTION FOR LEAVE FOR AN EXTENSION OF TIME TO**
5 **RESPOND TO PLAINTIFF'S CLASS ACTION COMPLAINT** to be served as follows:

6 ☐ by depositing same for mailing in the United States Mail, in a sealed envelope
7 addressed to:
8

9
10 ☐ pursuant to FED. R. CIV. P. 5(b)(2)(E) to be sent via electronic means as indicated:

11 ☐ to be hand delivered to:

12 and/or

13 ☒ by the Court's CM/ECF System.
14

15 /s/Charles H. McCrea
16 An Employee of
17 HEJMANOWSKI & McCREA LLC
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